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May 9, 2011

BY E-MAIL

All Participants in Plan Discovery First Amended Official Service List

Re: Lehman Plan Discovery - Preliminary Document Requests

Dear Participants,

In order to ensure consistent and reciprocal deadlines for the plan discovery process (and thereby maximize efficiencies in connection with any meet and confer sessions), the Debtors and the Unsecured Creditors Committee (as the nominated and putative Designated Party) agree that the deadline for filing Preliminary Requests to the Debtors pursuant to Paragraph 3(a) of the Order¹ will be May 19, 2011 and that the deadline for the Debtors to make available the Preliminary APP Requests and the Preliminary Participant Requests pursuant to Paragraphs 5(a) and (6)a of the Order will be extended to May 19, 2011.

Sincerely,

Randi W. Singer

cc: David S. Cohen, Esq.

Milbank, Tweed, Hadley & McCloy LLP

¹ Order Establishing Schedule and Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, dated April 14, 2011 [Docket No. 16003] (the "**Order**"). Capitalized terms not defined herein shall have the meaning attributed to them in the Order.